

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In re: Curt & Lori Johnson,	)	
	)	Case No. 17-47393
U.S. Bank National Association,	)	
Lender, Respondent	)	
RUSHMORE, Servicer	)	
Lender, Respondent	)	Motion For Relief From Stay
	)	To Enter Into Loan Modification
	)	Agreement

**MOTION FOR RELIEF FROM AUTOMATIC STAY TO  
NEGOTIATE MORTGAGE LOAN MODIFICATION**

The Debtors, Curt & Lori Johnson, file this Motion for Relief from Automatic Stay to Negotiate Mortgage Loan Modification (the “Motion”), and, in support thereof, would show the Court the following.

1. The Court has jurisdiction of this Motion pursuant to 28 U.S.C. §§ 157(a) and 1334(a) and Local Rule 9.01(B)(1) of the United States District Court for the Eastern District of Missouri. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(G).
2. The Debtors seek to conduct negotiations with the Debtors’ current mortgage lender, **U.S. Bank National Association, Lender (the “Lender”), RUSHMORE, (the “Servicer”)**, in an attempt to reach agreement on a modification of the loan secured by the Debtor’s(s’) residential real estate located at **6 Weatherby Ct., Washington, MO 63090 (the “Loan”).**
3. The Debtors request that the automatic stay of 11 U.S.C. §362(a) (the “Automatic Stay”) be lifted for the limited purpose of allowing Loan modification negotiations with the Lender to take place.
4. Should the Debtors and the Lender reach an agreement on a Loan modification, the Debtors will seek further relief from the Automatic Stay so that the Debtors and the Lender may enter into the Loan modification. Such relief will be requested on no less than 10 days notice to the Chapter 13 Trustee.

WHEREFORE, premises considered, the Debtors request that the Court grant the relief requested in this Motion and any other such relief to which the Debtors may be entitled.

DATE: 4/21/2022

/s/ Greg A. Luber  
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**CERTIFICATION OF SERVICE**

I certify that a true and correct copy of the **MOTION FOR RELIEF** were filed electronically on 4/21/2022, with the United States Bankruptcy Court and has been served on the parties of interest via email by the Court's CM/ECF system as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the **MOTION FOR RELIEF** were filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to the parties listed below on

DATE: 4/21/2022

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